

ERIC W. SWANIS, ESQ.
Nevada Bar No. 06840
BETHANY L. RABE, ESQ.
Nevada Bar No. 11691
JOEL M. EADS, ESQ.*
*Admitted Pro Hac Vice
GREENBERG TRAUIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: swanise@gtlaw.com
rabeb@gtlaw.com
joel.eads@gtlaw.com

Counsel for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LING CAI et al.;

Plaintiffs,

v.

ENTERPRISE RENT-A-CAR OF SAN
FRANCISCO, LLC d/b/a "ALAMO," et al.,

Defendants.

Case No. 2:23-cv-00050-NJK

**STIPULATION AND PROPOSED
ORDER TO EXTEND TIME FOR
SUBMITTING DISMISSAL PAPERS**

[SECOND REQUEST]

Defendants Enterprise Rent-A-Car OF San Francisco, LLC d/b/a "Alamo," Rental Insurance Services, Inc., ELCO Administrative Services Co. d/b/a "Rental Claims Services" and ACE American Insurance Company (collectively, the "Defendants"), by and through their undersigned counsel, and Plaintiffs Ling Cai, Jing Xu, Z.X. a minor by and through his Natural Parent Jing Xu, and Tammy Harless, as Special Administrator of the Estate of Zhongping Zhou ("Plaintiffs" and collectively with Defendant, the "Parties"), by and through their undersigned counsel, hereby stipulate to extend the deadline to submit dismissal papers by thirty (30) days, from September 30, 2024 to October 30, 2024.

This case has settled. *See* ECF No. 80. On July 15, 2024, this Court entered an order providing that dismissal papers must be filed by August 30, 2024. *See* ECF No. 81. On September 3, 2024, the

1 Court entered an order [ECF No. 83] extending that deadline until September 30, 2024 pursuant to the
 2 Parties' stipulation [ECF No. 82] regarding the same.

3 The Parties have continued to diligently work to finalize the settlement and submit the dismissal
 4 papers pursuant to the Court's order, including preparation of and revisions to the draft, written
 5 settlement agreement. However, various unavoidable delays and issues have continued to hamper the
 6 Parties' ability to finalize the dismissal papers, including those associated with the Plaintiffs living in
 7 China, the specific allocation and apportionment of the settlement funds among the Plaintiffs,
 8 communication and interpretation issues, and the fact that the agreement contains relatively uncommon
 9 terms such as a minor's compromise and probate court approval. As such, the Parties stipulate and
 10 agree, and respectfully request an order from the Court, that the time to file dismissal papers be extended
 11 by thirty (30) days, to October 30, 2024. If the Parties are able to submit such papers sooner, they will
 12 do so.

13 This stipulation is made in good faith and not for purposes of delay.

14 **IT IS SO STIPULATED.**

15 DATED this 30th day of September, 2024.

16 **THE 702 FIRM**

17 */s/ Michael C. Kane*

18 Michael C. Kane, Esq.
 19 Nevada Bar No. 10096
 20 Bradley J. Meyers, Esq.
 21 Nevada Bar No. 8857
 8335 W. Flamingo Road
 Las Vegas, Nevada 89147

22 *Counsel for Plaintiffs*

DATED this 30th day of September, 2024.

GREENBERG TRAURIG, LLP

/s/ Eric W. Swanis

Eric W. Swanis, Esq.
 Nevada Bar No. 06840
 Bethany L. Rabe, Esq.
 Nevada Bar No. 11691
 10845 Griffith Peak Drive, Suite 600
 Las Vegas, Nevada 89135

Counsel for Defendants

23
 24 **IT IS SO ORDERED.**

25 
 26 UNITED STATES MAGISTRATE JUDGE

27 DATED: October 1, 2024
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